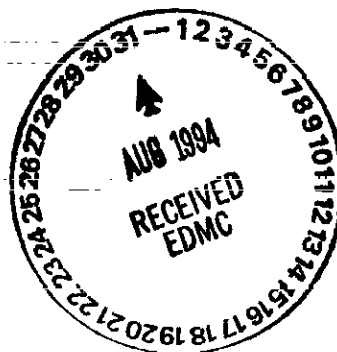


1209-S. Belfair Pl.
Kennewick, WA 99337
February 5, 1994



Mr. Bryan L. Foley
U. S. Department of Energy
P. O. Box 550, MSIN A5-15
Richland, Washington, 99352

Subject: COMMENTS ON PROPOSED ENVIRONMENTAL RESTORATION DISPOSAL
FACILITY EVALUATION SCOPE

Mr. Foley:

9413285-1402

The scope of the proposed Environmental Restoration Disposal facility (ERDF) as presented January 25, 1994, did not include any site alternatives. The site of the facility had apparently already been determined. That determination, however, did not include evaluation of a site which meets the criteria for Site 3, and in addition will provide long term saving of money and habitat. This site is the BC Control Area. It is located immediately to the east of Site 3, in fact, the Site 3 expansion is almost totally within the BC Control Area. This area is approximately 5 square miles in size, has spotty radioactive surface contamination, and has undisturbed sagebrush habitat. Evaluation of this site should be part of the ERDF Evaluation Scope.

There are several very good reasons for siting the ERDF at the BC Control Area. They require that a broader and longer term view of Hanford cleanup be considered.

The first reason is the cost savings which would be achieved by incorporating the cleanup of BC Control Area with the construction and operation of the ERDF. Although it would depend on the final size of the ERDF, a real and substantial cost saving would be realized from not having to move the contaminated surface soil at BC AND its equivalent at ERDF. By performing the ERDF construction and operation with the cleanup, that effort would be combined.

Another reason is fulfilling the recommendation of the Hanford Future Site Uses Working Group to minimize the land devoted to waste management activities. The BC Control Area, because of its contaminated status is currently dedicated to a waste management purpose. The ERDF will also dedicate a large tract for long term waste management use. Locating the ERDF in the BC Control area will keep the amount of land dedicated to waste management as low as possible.

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ENVIRONMENTAL PROTECTION

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A third reason is that sagebrush habitat destruction will be kept to a minimum. BC Control Area cleanup will require removal of soil and vegetation from several square miles of land. ERDF construction and operation will also require large scale removal of vegetation and soil. Site 3 and BC Control Area are both situated in the same large undisturbed sagebrush habitat. Locating the ERDF at BC Control area will reduce the loss of sagebrush habitat. It appears that Department of Energy and the State of Washington place enough value on sagebrush habitat that \$60,000 from hazardous waste fines were directed toward its restoration on the ALE Reserve (see attached story from Tri City Herald, January 25, 1994). Locating ERDF in the BC Control Area would be consistent with this value. The current and future activities at the BC Control Area and construction and operation of the ERDF are compatible land uses which should be considered together.

These are the most significant reasons for siting the ERDF at BC Control Area, although others exist. Their value becomes clear when viewed from an overall Hanford Cleanup perspective, versus one limited to ERDF itself.

Sincerely,

William M. Hayward

William M. Hayward

cc: Pam Innis (US-EPA)
Norm Hepner (Ecology)

Westinghouse Hanford, DOE reroute hazardous waste fine

Money to buy ALE sagebrush

By JOHN STANG

Herald staff writer

The money owed for a state hazardous-waste fine will go to replanting sagebrush at Hanford and creating a Columbia Basin College fund for student aid.

Last month, the state agreed to allow Westinghouse Hanford Co. and the Department of Energy to reroute payment of a \$100,000 fine to those two projects.

That agreement resolved an appeal of the fine by Westinghouse and DOE.

Last spring, the Washington Department of Ecology fined Westinghouse and DOE for delays in identifying the contents in 2,000 drums of hazardous and radioactive wastes stored in central Hanford.

The drums contained soil contaminated by various leaks and spills in Hanford's 200 Area.

It was the first fine levied against Hanford under a federal law that requires federal facilities to follow the same state environmental rules as private companies.

DOE and Westinghouse appealed the fine to the Washington Pollution Control Hearings Board.

DOE and Westinghouse contended the \$100,000 should be used for environmental cleanup rather than go to the state's general fund.

Ecology contended the \$100,000 could not be used for a cleanup measure that DOE and Westinghouse already are contractually obligated to do.

Under the settlement, Westinghouse will pay \$60,000 to Battelle-Northwest to plant sagebrush on Hanford's Arid Lands Ecology Reserve to restore lost habitat.

A 1984 range fire destroyed about 70 percent of the sagebrush in the

ALE reserve.

Sagebrush is prime habitat for sage grouse and loggerhead shrike, which are candidates to be considered threatened or endangered by the state.

The agreement calls for Battelle to use part of the money to buy seed and plan the planting.

Then Battelle would pay the rest to the Washington Department of Wildlife, which would tackle the actual planting.

The 60,000 sagebrush plants are scheduled to be planted in December.

Meanwhile, DOE is to pay \$40,000 to the CBC Foundation to create an endowment.

The interest from the endowment will fund grants for science or environmental science students to pay for tuition, fees and books.

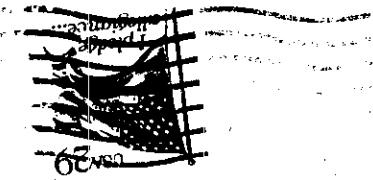
The foundation is to set the grant amounts. The grants are to be awarded according to financial need and academic promise.

DOE - 11/25/84

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